

## Idaho WIOA State Plan Section VI - Program-Specific Requirements

### *Title III - Wagner-Peyser Act Program*

#### **(a) Employment Service Professional Staff Development**

*(1) Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers.*

As Idaho's designated Wagner-Peyser employment services state agency, the Idaho Department of Labor's ongoing professional development of its Employment Service (ES) merit staff has provided the backbone for the successful performance of Idaho's One-Stop system which has been continually reflected in the state's Wagner-Peyser performance measures as well as in all workforce program performance measures for over a decade.

With the implementation of WIOA, the Department and other One-Stop core partners have a renewed vision for investment in the professional development activities for not only ES staff, but all staff within the one stop system and particularly within the One-Stop Centers. In the past, professional development activities for ES staff were provided by centralized Department staff. Under WIOA, central office staff will continue to provide initial training, technical assistance and guidance, however, two central office program managers are now out-stationed, travelling each month to engage with core partners and frontline staff on a daily basis, supporting all workforce programs to increase staff capacity and improve communications between state-level and field offices, with the goal of providing a professional level of service in a timely manner to both jobseekers and employers.

**Job seeker services** will see an increased integration of core partner programs' services in Idaho's One-Stop centers and affiliate sites that enhances access to the programs' services and improves long-term employment outcomes for individuals receiving assistance. As witnessed in each Memorandum of Understanding, Idaho's One-Stop core partners will be responsible for ongoing, regularly scheduled cross-training of co-located staff to ensure all staff have a working knowledge of all program services available at the facility to increase public access to those services. Training will develop service delivery skills of all One-Stop staff, but will have a higher focus on ES staff who interact with a wider swath of the public. Ongoing professional development will focus on:

- Understanding of each partner's career services and any eligibility requirements
- Knowledge of training services offered and any eligibility requirements
- Appropriate training to ensure all staff physically present at the One-Stop can correctly provide information to customers about the programs, services and activities available through partner programs
- Working knowledge necessary to correctly provide direct linkage through technology to program staff who can provide meaningful information or services
- Development of capacity to guide job seeker's completion of application forms or online screen programs/activities carried out in the One-Stop system
- User training regarding Idaho's employment service web-based, online system, *IdahoWorks*, which provides job openings and referrals for job seekers
- User training regarding Idaho's web-based unemployment insurance system, *iUS*, to strengthen linkages between the One-Stop system and the UI program, and to increase awareness of UI issues across core programs
- User training regarding Idaho's *Career Information System*, which provides staff and job seekers with

comprehensive career information, resources and services to help make successful education and career decisions

**Employer services** will witness an increase in quality as the Department of Labor takes the lead in further aligning services toward Idaho's targeted industry sectors. Idaho's Workforce Development Council analyzed key industries, occupations, demographics and other workforce and economic conditions. The state's analysis identifies a broad array high-growth, high-demand, livable-wage jobs. The state has prioritized specific sectors and occupations as to focus on and leverage its resources. The targeted sectors of energy, healthcare, technology and advanced manufacturing with an emphasis on aerospace and food processing – identified by various regional, economic development, industry and community leaders – are viewed as the economic engines to drive regional economic growth and provide individuals with strong wages and career paths.

The state has dedicated the Governor's Employment Service 10% Reserve Funds to support the following priorities under the Business Solutions Initiative:

- Dedicate selected One-Stop staff as regional business solutions specialists
- Enhanced business services activities focused on a sector strategy such as outreach, one-on-one meetings with targeted employers to learn their workforce needs, office team discussions and strategy session on how best to respond to identified employer needs and coordinating workforce needs with education, economic development and workforce partners
- A Customer Relationship Management system, providing automated business services tracking and information management to all One-Stops to:
  - Streamline service delivery
  - Enhance collaboration throughout the state's One-Stops
  - Monitor real-time sector activity, trends and needs at the local, regional and statewide level

Ongoing professional development will include:

- Staff training for all ES and selected One-Stop staff and managers within the One-Stop centers and affiliate sites on business outreach techniques, sales and promotion of services and how to effectively work with industry sectors prioritized by the planning process
- In-depth analysis of regional/local labor market data, particularly 'real-time' labor market data provided by Department of Labor's Regional Economists
- One-Stop partner staff meetings to develop knowledge of current training projects, training completers, who meet the in-demand needs of local targeted sector employers
- Training regarding work-based learning opportunities that can assist employers in resolving workforce needs, particularly registered apprenticeship models and, One- Stop partner funding opportunities available to support work-based learning

*(2) Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance program and the training provided for Employment Services and WIOA staff on identification of Unemployment Insurance (UI) eligibility issues.*

In 2014, Idaho modernized its unemployment insurance legacy mainframe systems, replacing mainframe functionality with the Internet Unemployment System (iUS), a new web-based application developed, supported and maintained by the Department of Labor. iUS helps Idaho employers and unemployed claimants alike. Web-based applications that interface with iUS provide simple self-service account maintenance for employers and claimants. Employers and claimants are alerted to important account changes through system-generated notifications that use templates containing understandable language and accurate account details. Employers and claimants also enjoy the benefit of speaking to IDOL employees who can access

account information with real-time up-dates, perform ad-hoc data queries and resolve issues more quickly. The iUS system also allows users to resolve UI issues online if they prefer.

As the state government agency tasked with administering the unemployment insurance program for collection of taxes from employers and disbursement of benefits to claimants, the Idaho Department of Labor will provide ongoing training and general information to all Center staff, including ES and WIOA staff, regarding general eligibility guidelines. UI staff assigned to the center will be responsible for handling UI eligibility issues. The Department's iUS system enhancements will include a feedback loop from Center staff to UI regarding identification and reporting of Unemployment Insurance issues. Since the Department has administered integrated UI, ES, and training program services (WIOA and its predecessors) for over 40 years, One Stop staff have a firm foundation to ensure successful processes under WIOA.

The Idaho Department of Labor has instituted the following strategies:

- *IdahoWorks*, the web-based system that supports a number of One-Stop programs including the ES and WIOA applicant/participant records and services, will be linked with iUS to ensure proper identification of unemployment insurance claimants; ES/WIOA staff will be trained to recognize the UI status of job seekers
- Idaho's unemployment insurance claimants will continue to be required to register for work/job seeker assistance within the *IdahoWorks* system
- Ongoing training regarding the iUS system, and improving awareness of UI eligibility issues across core programs, is included in the training identified under (a) (1), above
- Training for ES and WIOA staff on identification and reporting of eligibility issues to the iUS automated system was delivered in 2015 and will be provided annually by unemployment insurance technical support staff
- Fully-trained unemployment insurance staff will be available by phone and via real-time online help communication technology, during all business hours, to answer any questions from staff or claimants regarding UI issues

### **(b) Assistance to Individuals Filing Claims**

Idaho's unemployment insurance application process is now online. Idaho's iUS web-based system and staffing is designed to provide meaningful and personalized assistance in filing a claim for unemployment compensation at Idaho's One-Stop Centers, as well as at affiliate sites, in the following ways:

- When applying online, the iUS system provides written instructions in English; written instructions in Spanish are under development
- Each One-Stop Center and affiliate sites with ES staff provide a number of lobby computer stations to provide self-service access for filing an application for unemployment compensation or to access other online One-Stop services. These computer are being updated to improve thin client push of data, and are receiving larger monitors to reduce scrolling
- Each One-Stop Center and affiliate sites will also provide access to centralized, fully trained UI staff who will answer questions, assist with application or weekly claim filing. Centralized staff are available by phone or via online, real-time conversation technology on the public access lobby computers.
- iUS user guides and real-time communications support will be available for ES and WIOA frontline staff from the centralized UI section to support staff provision of information

### **(c) State's Strategy for Providing Reemployment Assistance to UI Claimants**

Idaho's One-Stop Centers will transition from the current REA program to the new RESEA program in January 2016. The ES and WIOA staff will provide an orientation to all RESEA claimants on the services available to them through the One-Stop Center or affiliate. They will then work with each claimant one-on-one to do a

thorough assessment of the claimant's current skills, abilities and also identify any barriers to reemployment. They will also provide customized labor market information to each claimant based on their specific situation. Working together with the claimant they will complete an individualized employment plan for each claimant. This may include additional follow up activities and services to assist the claimant in returning to work as soon as possible, including referrals to community services and training services as appropriate. The new RESEA program will focus solely on UCX (military) claimants and claimants profiled as most likely to exhaust their benefits. RESEA services may be provided for each claimant up to a total of five hours. The current REA services allow for a maximum of 2 hours per claimant.

#### **(d) Use of Wagener-Peyser Funds to support UI Claimants**

With both W-P and UI programs delivered by the Idaho Department of Labor, coordination of Wagner-Peyser funds to support UI claimants, and ensuring quality communications between W-P and UI has been one of the agency's top priorities for several decades.

- (1) Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

All in-state UI claimants are required to register for work and other labor exchange services to obtain UI compensation. When filing for UI, the iUS web-based system markets the array of labor exchange services available and provides immediate access to work registration, followed by immediate links to current employment opportunities for self-referral.

- (2) Registration of UI claimants with the State's employment service if required by State law;

Department program policy, not state law, requires registration.

- (3) Administration of the work test work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and

The Idaho Department of Labor, through its integrated W-P and UI staff and automated systems, has continuously supported and administered work test for the State unemployment compensation system and will continue to do so, including eligibility assessments, referral to UI adjudication if needed, and providing job finding and placement services for UI claimants.

- (4) Provision of referrals to and application assistance for training and education programs and resources.

WIOA training programs (Adult, Dislocated Worker and Youth) reflect high service levels for UI claimants over the years as Idaho has continued to improve its One-Stop program integrations. The Department of Labor's ES staff are not only co-located with WIOA, they are also participating in One-Stop partner and community meetings on a regular basis to remain up-to-date on training, education and resources. Ongoing ES staff interactions with claimants and referrals to training and education programs/resources will continue to occur under special efforts such as WPRS and RESEA. Additional outreach to link UI claimants to training opportunities will also continue under WIOA National Dislocated Worker Grant (NDWG) projects targeting long-term unemployment and profiled UI claimants, and other future funding opportunities.

#### **(e) Agricultural Outreach Plan**

##### *(1) Assessment of Need*

Most of Idaho's crop farming requiring intensive use of hand labor occurs in the southern part of the state on the Snake River plain. There are over 25,000 farms in Idaho with over 160 commodities produced. Idaho's crops include sugar beets, potatoes, onions, seed crops, grains, and fruits. Hops are cultivated in the northern and southwestern parts of the state and there is large production of peas and lentils in north-central Idaho.

Nursery operations are another important agricultural activity, mainly for the production of ornamental trees in north Idaho. The dairy industry, concentrated in the south-central part of the state, is on the rise; many large dairy operations produce their own hay on the same properties. Idaho currently leads the nation in the production of potatoes, food-size trout, and Austrian winter peas, and the state ranks third in the production of milk.

Idaho's need for an agricultural labor force has remained steady in the last few years despite the economic downturn, and it is projected that agriculture may become a high-demand industry. In preparing an outreach plan for upcoming years, the Department has considered the Migrant and Seasonal Farmworker Enumeration Profile Study and data provided by the 167 grantee in addition to projections provided by IDOL's Research & Analysis Bureau. The need for farmworkers is projected to remain at 55,000 during the peak of the agricultural season.

## *(2) Outreach Activities*

In 2015, the agency reorganized its service delivery organization by establishing a regional structure of its local office network. Seven regional offices in Kootenai County, Lewiston, Canyon County, Meridian, Magic Valley, Pocatello and Idaho Falls serve as central coordinators for all department activity within their geographic regions. The remaining offices within each region coordinate workforce activities with and report to the regional offices. This reorganization was to deal with a 20-25% reduction in staff at these offices.

Bureau of Labor Statistics' farmworker estimates are significant for the three southern regions of the State. The Department will provide appropriate outreach from its AJCs in the following communities located in these southern regions:

**Blackfoot** – Provides services to Bingham County

**Canyon County** – Located in city of Caldwell, provides services to Canyon County

**Mini- Cassia** – Located in the city of Burley, provides services to Minidoka and Cassia counties

**Pocatello** – Provides services to Power, Franklin, Caribou, Bear Lake, Oneida and Bannock counties

**Rexburg** – Provides services to Clark, Fremont, Madison, and Teton counties

In addition, during the months of high agricultural activity, the Department may provide or coordinate activities to reach MSFWs in the following communities:

**Bonnets Ferry** – Provides services to Boundary County

**Magic Valley** – Provides services to Twin Falls, Jerome, Gooding, and Lincoln counties

**Mountain Home** – Provides services to Elmore and Owyhee counties

**Payette** – Provides services to Washington and Payette counties

**Idaho Falls** – Provides services to Jefferson, Butte and Bonneville counties

Migrant and/or Seasonal Farmworker (MSFW) outreach workers are located in 10 of the 25 IDOL American Job Centers to best serve the state's high agricultural areas. The Department will ensure bi-lingual English/Spanish capability of staff assigned to outreach and ensures multi-lingual access through the use of language line tools to the state's one stop system.

During each year of this four-year plan, the Department's Wagner-Peyser (W-P) staff, in collaboration with its partner organizations also serving MSFWs throughout the state, will plan to reach 10% of the estimated migrant/seasonal farmworker population during the peak of the agricultural season in the counties served by outreach offices. As noted by USDOL, these numerical goals are in reference only to the proposed outreach activities and are not negotiated performance targets.

<b>AJC REGIONS Community Locations</b>	<b>Estimated Total Farmworker Population in Assigned Counties</b>	<b>Outreach Goals W-P staff</b>	<b>Outreach Goals in Conjunction with Other Agencies</b>
<b>NORTH IDAHO</b> – <i>Planned staffing at .25 FTE/year W-P</i>			
Bonn timers Ferry	667	40	30
<b>SOUTHWEST IDAHO</b> – <i>Planned staffing at 1 FTE/year W-P; .03/year Cooperating Agency</i>			
Payette	2409	145	100
Canyon County	5606	365	200
Mountain Home	2419	142	100
<b>SOUTH-CENTRAL IDAHO</b> – <i>Planned staffing at 1 FTE/year W-P; .06/year Cooperating Agency</i>			
Magic Valley	9775	290*	200*
Mini-Cassia	5168	317	200
<b>SOUTHEAST IDAHO</b> – <i>Planned staffing at 1.5 FTE/year W-P; .06/year Cooperating Agency</i>			
Rexburg	2950	200	95
Pocatello	5622	310	250
Idaho Falls	3330	185	150
Blackfoot	3452	195	150
<b>Total</b>	<b>41,398</b>	<b>2187</b>	<b>1475</b>

*\*Magic Valley – 5% outreach; adjusted due to high dairy count*

### *(3) The State's Strategies for Coordination, Marketing, Outreach*

#### **3.A. COORDINATING OUTREACH EFFORTS**

The Idaho Department of Labor, working through a cooperative agreement with the Community Council of Idaho (Idaho's 167 grantee) and through its One Stop partnerships with Idaho's Vocational Rehabilitation Services, Idaho Department of Education's Migrant Education Program and other community partners, will serve as a lead organization in coordinating outreach efforts at both the state and service area levels. All partners are dedicated to increasing MSFW customers' awareness and access to education, training and other services. At a minimum, the following collaborative activities will occur during the upcoming agricultural seasons:

- Review/renewal of cooperative agreements for coordination of services between the Idaho Department of Labor and the Community Council of Idaho
- Ongoing, mutual participation in staff training and ongoing communications to improve MSFW access to community services, particularly workforce services through the One Stop system
- Collaboration on development and sharing outreach materials among all entities
- Coordination of community information and staffing efforts at the local level to enhance outreach
- Sharing data for reporting and data analyses to improve partnership service delivery
- Assessment of opportunities and enhancement of processes to streamline co-enrollment

In order to leverage resources, staff will coordinate outreach activities with partner organizations in their area, targeting large events where a greater number of farmworkers may be contacted. The State Monitor Advocate and outreach workers will continue to make use of appropriate media, especially public service announcements using the multitude of radio stations throughout the state with Spanish programming.

### 3.B STATE'S OUTREACH STRATEGIES

At a minimum, three categories of information will be shared with individuals contacted through MSFW outreach activities:

- The full array of services provided by Idaho's One Stop system, particularly at the One-Stop Centers. Verbal instructions and local maps will be provided as needed; farm workers will be encouraged to go to the local One-Stop Center to obtain the full range of employment and training services.
- How to access and use the Department's complaint system. The Department has developed two bilingual (English/Spanish) brochures which will be reviewed verbally and given to the farmworker.
- Provision of a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment. The Department will provide verbal review of labor laws, farm labor contracts, and any other pertinent documents.

During outreach, staff will also be equipped to help interested farmworkers with registering for work, filing complaints, obtaining job referrals, and provide referrals to appropriate entities for needed supportive services.

All outreach activities and services provided by W-P staff will be documented in the Department's electronic outreach log application and reported as per requirements contained in 20 CFR 653.107. The Idaho Department of Labor's administration does not assign numeric goals for the number of staff years or for the level of funding to be used for outreach during the fiscal year. The administration recommends that outreach workers perform outreach activities as necessary to meet the needs of the communities they serve. Staff are trained to coordinate appropriately with other agencies and to target community events or activities that yield large numbers of contacts. They also prioritize outreach activities that provide opportunities for direct services, such as job referrals, taking complaints and other activities necessary to better serve the farmworker community.

#### *(4) Services Provided to Farmworkers and Agricultural Employers*

As with all job seekers, Idaho's One-Stop delivery system provides universal access to career services and training for migrant and seasonal farmworkers, offering flexibility to target services to the needs of the customer. W-P staff, in coordination with other One-Stop center partners, ensure that all basic career services, as defined by WIOA and which includes labor exchange services, are available to all individuals seeking services. Individualized career services as defined by WIOA will be available when deemed appropriate by One Stop center staff assessment. There is no operational requirement that services must happen in a specific sequence. Idaho's One-Stop system partners view MSFW outreach as an extension of its delivery system. If encouragement to visit the local One Stop Center/affiliate is successful, the individual's needs and interests can be thoroughly assessed, information on the full array of services provided, and coordination for career/training services from appropriate partner programs can take place. Self-service registration in the web-based IdahoWorks labor exchange system and many other forms and applications are available in Spanish to ensure language accessibility. Bilingual (Spanish/English) staff is available in each of the designated outreach offices to assist with registration and completion of any partner program forms and/or applications. In addition, the state has a contract for telephone language services with CTS LanguageLink.

Outreach workers will also encourage agricultural employers to consider business services from the local One Stop Center or affiliate site, including customized screening and referral of job seekers, customized services on employment-related issues, and customized recruitment events with other employers within the agricultural sector.

The Department will continue to process H2A applications through the Foreign Labor Certification program and will use its IdahoWorks labor exchange system for the referral of qualified US workers to fill available positions. A public registry with information on farm labor contractors licensed to operate in the state will

continue to be offered through the Department's Wage and Hour Section.

#### *(5) Other Requirements*

##### **Assessment of Progress**

The Department of Labor supported outreach staff in the five significant MSFW offices as noted in the prior plan, as well as staff in five other offices where the anticipated MSFW population warranted outreach during the months of high agricultural activity.

The collaboration of the Department of Labor and the Community Council of Idaho and their coordination with other agencies and community organizations as proposed in the prior plan has provided a solid foundation for delivery of information and services for migrant and seasonal farmworkers in Idaho. Broader partnerships with additional community organizations are planned for upcoming years, as reflected by the increase in partner contacts listed at the end of this document.

The following data regarding Idaho's PY2014 performance versus planned MSFW outreach and attainment of minimum service levels was provided by the Department of Labor's *IdahoWorks* MIS system and the Department's electronic outreach log records.

- MSFW planned outreach contacts (1789)  
*Attained 100%*
- Job order placement rate (42.5%)  
*Not Attained*
- Wage rate above minimum wage (14%)  
*Not Attained*
- Placement on long-term non-agricultural jobs (3%)  
*Not Attained*

*Not attained* for three factors above due to focus on WRIS-based performance outcome measures and reliance on automated reporting from employers rather than W-P staff follow-up and data-entry of placements. The Department of Labor notes that a comparison of MSFW total applications, referrals to employment and referrals to staff assisted services are equitable with non-MSFW total applications, referrals to employment and referrals to staff assisted services. The Department notes that these goals were established by USDOL in the late 1970's and recommend a review and update of these goals that consider current, up-to-date data and processes to determine equitable and reasonable rates based on current economic and labor conditions and technology that can make these measures relevant.

*Corrective Action – Wagner-Peyser management and outreach staff will assess data collection options to increase documentation of placements on job orders listed with AJCs. Connections with agricultural employers will increase as outreach staff connect with the business relations efforts implemented under WIOA legislation.*

- Review of 5 significant offices  
*Attained 100%*
- Conduct field checks on 25% of H2A employer sites employing US workers  
*Attained 61%*
- Conduct 5 MSFW contacts per staff day worked (8 hours)  
*Attained 100%*
- Timely processing of complaints (within 45 days of filing)  
*Attained 100%*

PY 2016 Plan for Agricultural Job Orders/Opening



- Number of agricultural job orders/openings expected to be received  
PY14 Actual = 921/5,196                      PY16 Planned = 920/5100
- Number of agricultural job orders projected to be filled  
PY14 Actual = 90\*                      PY16 Planned = 100
- Estimated number of interstate clearance orders the state will receive  
PY 14 Actual = 235                      PY16 Planned = 240
- Estimated number of interstate clearance orders the state will initiate  
PY 14 Actual = 440                      PY16 Planned = 450

\*Not a federal reporting requirement. To determine these numbers, the state applied its overall placement to opening ratio to calculate

### Outreach efforts

The State Monitor Advocate has directly contributed in drafting this agricultural plan and consideration has been given to the annual summary developed under 20 CFR 653.108(t)

Electronic copies of this plan have been provided to Idaho's WIOA 167 grantee, Community Council of Idaho, on December 2, 2015, with a request to submit written comments by December 11, 2015. The final draft of the plan and a request for comments were also sent to the following agencies/service providers with instructions to provide comments by the same date as above. In addition, this document will be incorporated into the State's WIOA plan, which will be posted for public comment for 30 days prior to finalization.

Erik Johnson, Director  
Migrant Unit  
Idaho Legal Aid  
[Erik.johnson@idaholegalaid.org](mailto:Erik.johnson@idaholegalaid.org)

Jane Donnellan, Administrator  
Idaho Division of Vocational Rehabilitation  
[jane.donnellan@vr.idaho.gov](mailto:jane.donnellan@vr.idaho.gov)

Ileana Cordova  
HEP/CAMP Recruiter  
Boise State University  
[icordova@boisestate.edu](mailto:icordova@boisestate.edu)

Sara Seamount, Migrant Coordinator  
Migrant Education Programs  
Idaho Department of Education  
[sseamount@sde.idaho.gov](mailto:sseamount@sde.idaho.gov)

Irma Morin  
Executive Director  
Council of Idaho  
[imorin@ccimail.org](mailto:imorin@ccimail.org)

Korene González, Director  
Employment and Training Community  
Community Council of Idaho  
[kgonzalez@ccimail.org](mailto:kgonzalez@ccimail.org)

Roy Vargas  
Farm Foreman  
Former FLC  
[rvargas@ruralnetwork.net](mailto:rvargas@ruralnetwork.net)

Sonia Martínez  
Diversity Outreach Coordinator  
Idaho State University  
[martsoni@isu.edu](mailto:martsoni@isu.edu)

Sam Byrd, Director  
Centro de Comunidad y Justicia  
[sbyrd@comunidadayjusticia.org](mailto:sbyrd@comunidadayjusticia.org)

Margie Gonzalez, Executive Director  
Idaho Commission on Hispanic Affairs  
[Margie.gonzalez@icha.idaho.gov](mailto:Margie.gonzalez@icha.idaho.gov)

Brian S. Bean  
Lava Lake Land and Livestock  
[brian@lavalake.net](mailto:brian@lavalake.net)

Michelle L. Woods, Center Director  
Centennial Job Corps CCC  
[woods.michelle@jobcorps.org](mailto:woods.michelle@jobcorps.org)

## WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:	
1.	The Wagner-Peyser Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3));
	<i>The Wagner-Peyser Employment Service is co-located with current One-Stop centers. The State assures continued compliance with this requirement as the State Council certifies one stop centers and affiliate sites during the life of this plan.</i>
2.	The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers;
	<i>As a grant recipient with significant MSFW One-Stop centers, the Idaho Department of Labor will consider its analysis of local workforce racial and ethnic characteristics when hiring and will undertake special efforts to recruit MSFWs and persons from MSFW backgrounds.</i>
3.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and
	<i>As reflected in this State Plan and in the Title I-B Assurances, the Idaho Division of Vocational Rehabilitation, which administers State laws for vocational rehabilitation of persons with disabilities, fully cooperates with the Idaho Department of Labor, which administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I.</i>
4.	State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations.
	<i>The Idaho Department of Labor is the designated state agency administering the Wagner-Peyser Act-funded labor exchange activities, which are provided by the agency's merit-based public employees in accordance with USDOL regulations.</i>